

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Criminal No.: 21-CR-108 (2) (PAM/TNL)

UNITED STATES OF AMERICA,

Plaintiff,

VS.

TOU THAO,

Defendant.

**MOTION FOR DISCOVERY AND
INSPECTION OF RECORDS OF ALL
ELECTRICAL SURVEILLANCE**

The Defendant, Mr. Tou Thao, by and through his attorneys, Robert Paule and Natalie R. Paule, respectfully moves this Court for an order directing the Government to disclose and allow inspection of all methods of electrical surveillance utilized by law enforcement in this case. This includes, but is not limited to, wire-tapping and the interception of telephone conversations, surveillance by radio transmissions or receptions, GPS surveillance, “triggerfish” surveillance, or any other form of electrical surveillance used by law enforcement during the investigation of this case.

Further, requiring the Government to disclose and allow inspection of any application for an order allowing such surveillance or any such orders, the logs of the surveillance made by law enforcement or their agents, copies of the recordings

obtained and any transcript thereof, and all returns of inventory of such surveillance.

Respectfully submitted,

Dated: This 3rd day of August, 2021

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